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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JEAN VASADI, DANIELLE MOYER,
JOSH SHEPHERD, LINDSEY
STONEBRAKER, GREG TREACY,
SCOTT TEITSCH, JEFFREY TAYLOR,
ETHAN GALLOWAY, RIDGE BERRY,
JUSTIN JONES, ANNA KING, SCOTT
KING, GORDON FRIEND, LAURA
LUCA, JOSE RODRIGUEZ, SAMUEL
SMITH, AMBER O'CONNOR, JUSTIN
O'CONNOR, LOGAN MCQUILLEN and
CHARLES REGNA, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendant.

Civil Action No. 2:21-cv-10238
(WJM)(AME)

**NOTICE OF MOTION TO STAY
AND COMPEL ARBITRATION**

PLEASE TAKE NOTICE that defendant Samsung Electronics America, Inc. ("SEA") shall move before the Honorable William J. Martini, U.S.D.J., at the United States District Court for the District of New Jersey, Newark, New Jersey, on October 4, 2021 at 9:00 am or at such other date and time as set by the Court,

for an Order pursuant to 9 U.S.C. §§ 3-4 to stay the action filed by Plaintiffs and to compel arbitration of Plaintiffs' claims.

PLEASE TAKE FURTHER NOTICE that in support of its motion, SEA will rely upon the Memorandum of Law, Certification of Nicole Cantwell and Proposed Order submitted herewith.

DATED: July 12, 2021

GREENBERG TRAURIG, LLP

By: s/ David Jay

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